

VIA EMAIL

January 16, 2025

Mr. Colin Peeples
PDC Staff
711 Capitol Way S., Rm 206
Olympia, WA 98504
pdcc@pdc.wa.gov

Re: PDC Case Number 164506

Dear Mr. Peeples,

I write on behalf of my client, Building a Stronger Washington Sponsored by Western States Regional Council of Carpenters ("BASWA"), in response to the attached complaint filed by Mr. Conner Edwards (PDC Case Number 164506) alleging violations of RCW 42.17A.235 and 42.17A.240 for not disclosing the identities of the persons who made contributions totaling \$34,999 and \$625, which were deposited on 10/11/24 and 10/16/24, respectively.

As noted in Mr. Edwards' complaint, the two contributions were disclosed on the C4 filed on 10/29/24, in compliance with RCW 42.17A.235(2)(a). Per RCW 42.17A.240(c), "[c]ontributions of no more than [\$100 (adjusted from \$25 per WAC 390-05-400)] in the aggregate from any one person during the election campaign may be reported as one lump sum if the treasurer maintains a separate and private list of the name, address, and amount of each such contributor." Please note that the \$625 deposit on 10/16/24 consists solely of contributions from individual members of the Western States Regional Council of Carpenters, none of whom have contributed more than \$100 in the aggregate. As required by RCW 42.17A.240(c), BASWA maintains records detailing the name and address of each contributor and the amounts contributed to BASWA.

In addition, RCW 42.17A.235(5) requires that a report be filed each Monday during the months preceding an election, disclosing any bank deposits made during the previous seven calendar days. The report is required to contain the name of each contributor and amount contributed. However, it similarly provides an exception for persons contributing no more than \$100, specifying that such contributors "are not required to be identified on the report."

Because 2024 was the first time our firm filed with the Public Disclosure Commission on behalf of this entity and due to our relative inexperience with the Washington filing system (and in particular, the unique requirement to disclose bank deposits on a weekly basis), we were not aware that such reports were required and mistakenly believed that the deposits were adequately disclosed on the C4 since that report was also required to disclose all contributions received and expenditures made. We were under the impression that the C3 was part of the C4 report given that it is specifically referenced on the C4 report but the C4 also discloses the

Mr. Colin Peeples
January 16, 2025
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deposit dates and amounts. However, now that we understand that C3s are separate reports that need to be filed in addition to the C4s, we have filed the C3s for the two deposits and will make sure to file them for future deposits as well.

Given that all contributors of the \$625 deposit made contributions of less than \$100 in the aggregate and did not need to be identified on a C3, we believe the late disclosure did not result in any harm to public disclosure. Similarly, the \$34,999 contribution was made by the Western States Regional Council of Carpenters, the sponsor of BASWA, so we do not believe the public was deprived of critical information regarding outside funding of the committee—100% of the committee's contributions came from the Western States Regional Council of Carpenters itself or its members, and its involvement is clearly disclosed in the name of the committee. Lastly, because the late filings were inadvertent, we respectfully request that you close the matter without taking any further action.

Please let us know if you have any questions or if there is any additional information we can provide.

Sincerely,



Emily Andrews
Counsel to Building a Stronger Washington Sponsored by Western States Regional Council of Carpenters

Respondent Name
Building a Stronger Washington
Complainant Name
Conner Edwards
Complaint Description
<p>Conner Edwards reported via the portal (Wed, 6 Nov 2024 at 5:51 PM)</p> <p>Description of Complaint</p> <p>See attached complaint.</p> <p>Notice to Respondent</p> <p>I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff with a so-called "warning letter".</p> <p>This complaint is one of hundreds that I have filed to highlight and ultimately fix the significant shortcomings associated with the agency responsible for administering our state's campaign finance laws.</p> <p>What are these shortcomings?</p> <p>Overcomplicated and outdated requirements that are difficult to understand and comply with. Failure to properly educate the regulated community about the tasks they must perform to remain in compliance with applicable requirements and avoid complaints. Failure of the agency to send regular reminders to filers about pending deadlines. A failure to proactively enforce applicable requirements which enables the complaint system to become weaponized. Non-intuitive, non-user friendly, and buggy reporting software. Failure to meaningfully enforce core requirements. Failure to follow the best operating practices of other neighboring campaign finance agencies. An agency leadership structure that largely disregards stakeholder input and is slow to identify and resolve major agency deficiencies.</p> <p>I believe that the best way to motivate the agency to address these problems is by filing a large number of complaints so that the agency's problems become impossible to ignore.</p> <p>Slowly (too slowly) this strategy is starting to yield concrete and beneficial changes. You can read about these changes here: https://www.seattletimes.com/seattle-news/politics/why-one-man-filed-800-campaign-finance-complaints-against-wa-candidates/</p> <p>If you believe that the agency could have done something different to help you proactively avoid the issues identified in this complaint, I hope that you will consider including it in your response. The agency, and the public, can benefit from your perspective and feedback.</p> <p>"The journey of a thousand miles begins with a single step." — Lao Tzu</p>
What impact does the alleged violation(s) have on the public?
See complaint. The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency's failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.
List of attached evidence or contact information where evidence may be found
See complaint and also PDC website.
List of potential witnesses with contact information to reach them
See complaint and also PDC website.
Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS AND
EXPENDITURES**

C4

Building a Stronger Washington Sponsored by Western States Regional Council of Carpenters

25120 Pacific Highway South
Kent, WA 98032

Coverage: 01/01/2024 to 10/28/2024

Final report: No

Report number: 110257052

Reporting year: 2024

Date submitted: 10/29/2024

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$0.00
2. Cash received (Schedule A line 1).	\$35,624.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$35,624.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$35,624.00
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

EXPENDITURES

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$0.00
11. Cash expenditures (Line 3 schedule A).	\$4,125.00	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$4,125.00
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$4,125.00

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$31,499.00
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$31,499.00

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Antonio Acosta - 10/29/2024

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
10/11/2024	\$34,999.00	10/16/2024	\$625.00		

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$35,624.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Credit/Debt	Cash
N/A	Expenses	Non-itemized expenditures		\$0.00
10/23/2024	Friends of Natasha Hill 2208 W. 2nd Avenue , Spokane, WA 99201	Monetary contributions to PAC or candidate: Monetary contributions to PAC or candidate		\$975.00
10/23/2024	People for April Connors 3911 W. 27th Avenue , Kennewick, WA 99337	Monetary contributions to PAC or candidate: Monetary contributions to PAC or candidate		\$975.00
10/23/2024	People of Chelsea Dimas P.O. Box 773 , Sunnyside, WA 98944	Monetary contributions to PAC or candidate: Monetary contributions to PAC or candidate		\$975.00
10/23/2024	People of Maria Beltran P.O. Box 2011 , Yakima, WA 98907	Monetary contributions to PAC or candidate: Monetary contributions to PAC or candidate		\$1,200.00
			\$0.00	\$4,125.00

4. TOTAL EXPENDITURES: \$4,125.00

Building a Stronger Washington

Sponsored by Western States Regional

Council of Carpenters

2024

- Overview
- Contributions
- Expenditures
- Pledges
- Debts
- Loans

Committee Overview

Registered December 8, 2023

Continuing Committee

Treasurer is Antonio Acosta

Committee Contact

25120 Pacific Highway South

Kent, WA 98032

compliance@olsonremcho.com

916-442-2952

Financial Overview

\$0.00

Starting balance

+

\$0.00

Contributions

+

\$0.00

Loans

=

\$0.00

Total raised

\$4,125.00

Total spent

\$0.00

Pledges

\$0.00

Debt

Committee Reports and Forms

Registration Form

[Contributors and Vendors Map](#)

Made to committee for 2024

Contributions

See who has contributed cash and in-kind (non-monetary) contributions to the committee..

No contributions reported.

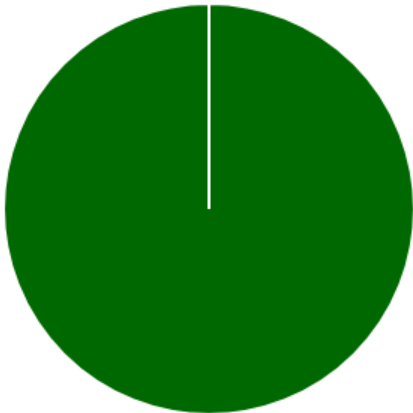
Made by committee for 2024

Expenditures

See how the committee has spent money, and what kind of goods and services it received as in-kind contributions.

Expenditures made by candidate for 2024

Monetary contributions to PAC...
\$4,125.00



Made to committee

Loans

See loans received, forgiven or paid by the campaign.

\$0.00

Held by committee

Debts

See the campaign's debt reporting history.

\$0.00

Campaign Finance Reports

See the reports filed by the committee. Reports with a strikethrough were amended by another report.

Show

25

 entries

[Download 1 rows as CSV.](#)

Period	Report Number	Filed	Report	Form Type	Election Year
01/01/2024 - 10/28/2024	110257052	10/29/2024	View Report	C4	2024

Showing 1 to 1 of 1 entries

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Next

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For Incidental Committees

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FILE ONLINE

Complaint Against: Building a Stronger Washington

Submitted: 11/6/24

Notice to Respondent by: 11/16/24 per WAC 390-37-050(1)

90 Day Initial Hearing Deadline: 2/4/25 per RCW 42.17A.755(3)

Statutes Violated: RCW 42.17A.235, .240

Background

Washington State's Campaign Finance Disclosure Law

One of the primary purposes of the public disclosure law is to provide citizens of this state, and especially voters, with the means for becoming informed about the financing of political campaigns.¹ The public disclosure law was enacted through voter approval of Initiative 276 in 1972.

State law requires candidates and committees that register under full reporting to submit regular reports of financial activity. Those reports are filed on schedules outlined on the PDC's key reporting dates calendar.²

Violations

This respondent received a \$34,999.00 contribution deposited on 10/11/24 and a \$625.00 contribution deposited on 10/16/24. The identity of who donated those funds was never disclosed. See attached and also link: <https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110257052>.

Conclusion

The PDC has an obligation to provide transparency to the voters by enforcing disclosure requirements. The agency's failure to actively monitor compliance with these requirements and enforce them damages both the public and members of the regulated community.

I urge the PDC staff to take quick action and resolve the noncompliance identified in this complaint.

Best,

Electronically signed Conner Edwards

/s/ Conner Edwards

Complainant

Notice to Respondent

I apologize to you for any inconvenience caused by this complaint. The chance that you will actually be fined for the violations identified above is extremely small because the agency is averse to doing the work

¹ <https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics>

² <https://pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics/key-dates-2024>

necessary to bring cases to hearings. Most likely this case – and any future cases against you – will simply be dismissed by staff with a so-called "warning letter".

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What are these shortcomings?

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